DAVIS, ERMIS & ROBERTS, P.C., 1010 N. Center, Suite 100 Arlington, Texas 76011 (972) 263-5922 Telephone (972) 262-3264 Facsimile Attorneys for Debtor(s)

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In Re:

\$ Case No.: 18-43088-MXM-11

\$ DR. SHABNAM QASIM MD PA

\$ CHAPTER 11

\$ Debtor(s)

APPLICATION TO APPROVE EMPLOYMENT OF ACCOUNTANT FOR DEBTOR IN POSSESSION

NO HEARING WILL BE CONDUCTED UNLESS A RESPONSE IS FILED WITH THE CLERK OF THE U.S. BANKRUPTCY COURT AT 501 W. TENTH STREET, FORT WORTH, TX 76102-3643 BEFORE CLOSE OF BUSINESS ON OCTOBER 12, 2018 WHICH IS AT LEAST TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE. IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE MARK X. MULLIN, U.S. BANKRUPTCY JUDGE:

The application of **DR. SHABNAM QASIM MD PA**, ("Applicant"), respectfully represents:

I.

On 8/7/2018, Applicant filed a Petition under Chapter 11 of the Bankruptcy Code.

II.

The Debtor asserts that it is necessary to retain an accountant in the administration of this estate for the following specified purposes:

- A. Preparation of income tax returns
- B. Preparation of F.I.C.A. and withholding tax returns;
- C. To Provide adequate control over the revenue from the operation of the professional association; and
- D. Prepare Operating Reports

III.

The Debtor desires that it be authorized to employ James R. Halter, CPA, 17055 Windward Lane, Addison, Texas 75001 for such compensation and reimbursement of expenses as is just. Said accountant is experienced and qualified to render the professional services described herein.

IV.

The accountant to the Debtor's knowledge, James R. Halter, CPA is a disinterested party in all material respects. The Debtor believes that the employment of such an accountant would be in the best interest of the estate. Attached hereto as Exhibit "A" is the Affidavit of James R. Halter concerning the qualifications and disinterestedness of his firm.

WHEREFORE PREMISES CONSIDERED, the Debtor respectfully prays that it be authorized to employ James R. Halter, CPA, as accountant for the Debtor in this proceeding for such compensation and reimbursement of expenses that is just; and that James R. Halter, CPA be reimbursed and compensated for his services upon proper motion submitted to this Court.

Respectfully submitted,

/s/ Craig D. Davis
RONALD W. ROBERTS
State Bar No. 17018600
CRAIG D. DAVIS
State Bar No. 00793588
JEFFREY W. ERMIS
State Bar No. 24032159
1010 N. Center, Suite 100
Arlington, Texas 76011
(972) 263-5922 Telephone
(972) 262-3264 Facsimile
Attorneys for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on the date the instrument was filed electronically. Service was accomplished via ECF and/or First Class Mail to the parties indicated on the mailing matrix filed with the Court.

/s/ Craig D. Davis
RONALD W. ROBERTS
CRAIG D. DAVIS
JEFFREY W. ERMIS

DAVIS, ERMIS & ROBERTS, P.C. 1010 N. Center, Suite 100 Arlington, Texas 76011 (972) 263-5922 Telephone (972) 262-3264 Facsimile Attorneys for Debtor(s)

IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§	CASE NO. 18-43088-MXM-11
DR. SHABNAM QASIM MD PA	§ §	
DEBTOR	§ § 8	CHAPTER 11
STATE OF TEXAS COUNTY OF TARRANT	\$ \$ \$	

AFFIDAVIT OF PROPOSED ACCOUNTANT

BEFORE ME, the undersigned authority, on this day personally appeared James R. Halter, a Certified Public Accountant, Addison, Texas, who upon being duly sworn upon oath, deposed and stated:

- 1. That he is a resident of ADDS , DALLAS County, Texas; that he is over the age of 21 years and is of sound mind and has never been convicted of an offense; that he is a Certified Public Accountant practicing in Dallas, County, Texas and possesses all of the qualifications of a Certified Public Accountant in the State of Texas.
- 2. That he has read the Application by the Debtor for approval to employ James R. Halter as accountant in this Chapter 11 bankruptcy proceeding. That James R. Halter, CPA is an accountant admitted to practice with extensive knowledge and experience in bankruptcy practice, and James R. Halter, CPA is in all respects qualified to render the necessary accounting services in this case.
- 3. That James R. Halter, CPA is disinterested and has no connections with the Debtor, creditors of this estate, or any party of the U. S. Trustee's office, or any party in interest which have interests adverse to the bankruptcy estate.

4. That James R. Halter, CPA has performed accounting services for the Debtor prior to the filing-of-its-Chapter 11 Bankruptcy. James R. Halter, CPA waives all claims that he has against the Debtor for the pre-petition services.

FURTHER AFFIANT SAYETH NOT.

James R. Halter, CPA

SIGNED AND SWORN TO before me on this this 26th day of September 2018.

LESLIE A FERRONI
My Commission Expires
June 23, 2019

OTARY PUBLIC

My Commission Expires: <u>June</u> 23, 2019